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VIA ECF

January 4, 2018

Honorable Debra C. Freeman, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square, Room 705
New York, NY 10007

**Re: *Starr Surplus Lines Insurance Company and Houston Casualty
Company v. CRF Frozen Foods, LLC*
Civil Action No.: 17-cv-1030 (PGG)**

Dear Judge Freeman:

Defendant CRF Frozen Foods, LLC ("CRF") and Plaintiffs Starr Surplus Lines Insurance Company ("Starr") and Houston Casualty Company ("HCC") by and through their undersigned counsel, submit this joint letter. On October 12, 2017, the parties in accordance with Judge Gardephe's Individual Rules of Practice 4E, submitted a joint letter, in order to resolve certain discovery disputes ("Discovery Disputes"). On October 16, 2017, Judge Gardephe referred the Discovery Disputes at Docket No. 98 to Your Honor for resolution. The parties understand that the Court has not yet made a ruling on Docket No. 98.

Despite the unresolved discovery dispute, the parties have moved forward with discovery including extensive depositions. To date, the parties have completed a total of 8 depositions of parties and non-parties. Another 10 depositions are scheduled and confirmed through February 1, 2018. While no other depositions have been noticed, it is possible that several additional depositions may be sought. The parties believe that resolution of, or Court guidance regarding, the Discovery Disputes will aid the parties in an efficient completion of the depositions, including those 10 depositions that are scheduled through February 1, 2018. The Fact Discovery End Date is set for February 7, 2017.

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If the Court requires additional information from the parties in order to resolve Docket No. 98, please let us know.

Respectfully submitted,

/s/ Steven J. Pudell
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/s/ John A. Nadas
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*COUNSEL FOR HOUSTON CASUALTY
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cc: Hon. Paul G. Gardephe, U.S.D.J.